

#1

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 30, 2018 12:19:44 PM  
**Last Modified:** Tuesday, January 30, 2018 12:23:12 PM  
**Time Spent:** 00:03:28  
**IP Address:** 172.58.32.235

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Page 1

**Q1** First Name (Optional)

Danilo

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**Q2** Last Name (Optional)

Soda

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**Q3** Organization (Optional)

Respondent skipped this question

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**Q4** Title (Optional)

Medical Patient

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

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**Q6** Feedback for Subcommittee

Medical patients should not have to pay taxes, as previuos to the newest legislation. Many patients are low income etc, and would get the state card to avpid being taxed. Somehow there are now loopholes to that previous decision. Please pass legislation to address tax issues for medical patients.

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#2

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 30, 2018 2:20:11 PM  
**Last Modified:** Tuesday, January 30, 2018 2:24:03 PM  
**Time Spent:** 00:03:51  
**IP Address:** 73.223.252.174

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Page 1

**Q1** First Name (Optional)

Ray

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**Q2** Last Name (Optional)

Perz

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**Q3** Organization (Optional)

CA Equity Business Corporation

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**Q4** Title (Optional)

CEO

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

1) We need to capture minority applicants from the online application process giving the committee data on minority applicants.

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#3

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 30, 2018 6:08:57 PM  
**Last Modified:** Tuesday, January 30, 2018 6:11:53 PM  
**Time Spent:** 00:02:55  
**IP Address:** 98.248.241.98

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Page 1

**Q1** First Name (Optional)

Leslie

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**Q2** Last Name (Optional)

Valencia

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**Q3** Organization (Optional)

Cannabis Equity Org

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**Q4** Title (Optional)

Founder/CEO and Researcher

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

More information on the Community Reinvestment Fund needs to be provided and the process of how funds will be obtained needs to be transparent. While Oakland, Los Angeles, and San Francisco have implemented Equity Programs (and now Sacramento), there are no equity efforts at the state level and these jurisdictions need assistance in order to ensure that their equity applicants can obtain state compliance as well.

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#4

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 30, 2018 8:56:31 PM  
**Last Modified:** Tuesday, January 30, 2018 8:58:57 PM  
**Time Spent:** 00:02:26  
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Page 1

**Q1** First Name (Optional) Respondent skipped this question

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**Q2** Last Name (Optional) Respondent skipped this question

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**Q3** Organization (Optional) Respondent skipped this question

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**Q4** Title (Optional) Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Equity Subcommittee**

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**Q6** Feedback for Subcommittee

I think the committee should address social equity programs throughout the state

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#5

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 11:15:38 AM  
**Last Modified:** Tuesday, February 06, 2018 11:21:08 AM  
**Time Spent:** 00:05:29  
**IP Address:** 50.250.197.190

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Page 1

**Q1** First Name (Optional)

Brian

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**Q2** Last Name (Optional)

Kahn

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**Q3** Organization (Optional)

Cannabis Operator

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**Q4** Title (Optional)

Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

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**Q6 Feedback for Subcommittee**

The regulations need to be updated to properly address who is able to properly manage all the cannabis waste that will be created. More specifically, the regulations need to ensure that if a cannabis operator is going to utilize a third party cannabis waste management company, the cannabis waste management company must obtain the proper cannabis licenses to transport and render the cannabis waste. Any random person or existing trash company CANNOT handle cannabis waste. This cannabis waste management company MUST have the appropriate cannabis licenses such as a cannabis distribution license and cannabis manufacturing license (processing license). Since the product that will be picked up is untreated cannabis product (un-rendered cannabis product), the movement of the cannabis requires a distribution license. The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also help with the track and tracing of all stages of the cannabis product through Metrc since all cannabis license holders need to use the track and trace system. The proposed changes will guarantee that all cannabis waste is being handled by cannabis-permitted companies that have extensive working knowledge in the industry. These changes will ensure that all cannabis waste streams are properly identified and documented through the State's Track and Trace System, and ensure all cannabis operators are working compliantly together.

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#6

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 1:16:07 PM  
**Last Modified:** Tuesday, February 06, 2018 1:21:02 PM  
**Time Spent:** 00:04:54  
**IP Address:** 174.214.5.81

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Page 1

**Q1** First Name (Optional)

Matt

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**Q2** Last Name (Optional)

Hummel

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**Q3** Organization (Optional)

Oakland Cannabis Regulatory Commission

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**Q4** Title (Optional)

Chairperson

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

We in Oakland are working to fix the oversight that disallows donations by making donors pay tax for the value they donate. This is unacceptable. Please fix this on your end. I'm happy to help any way I can.

thanks,

Matt Hummel

510-228-5063

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#7

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 1:19:50 PM  
**Last Modified:** Tuesday, February 06, 2018 1:22:08 PM  
**Time Spent:** 00:02:18  
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Page 1

**Q1** First Name (Optional)

Respondent skipped this question

**Q2** Last Name (Optional)

Respondent skipped this question

**Q3** Organization (Optional)

Respondent skipped this question

**Q4** Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

We are curious when applications can be taken for the equity program we have reached out to the city many times, I know they are swamped, we just don't want to miss the boat.

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#8

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 2:22:41 PM  
**Last Modified:** Tuesday, February 06, 2018 2:24:14 PM  
**Time Spent:** 00:01:32  
**IP Address:** 73.93.155.175

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Page 1

**Q1** First Name (Optional)

Megumi

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**Q2** Last Name (Optional)

Reagan

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**Q3** Organization (Optional)

Respondent skipped this question

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**Q4** Title (Optional)

Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

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**Q6 Feedback for Subcommittee**

To Whom It May Concern:

I'm writing you to express concern over cannabis waste regulations. Cannabis waste comes in innumerable forms. I've found that the layman generally associates cannabis waste with leaves, stalks, stems, and other plant and soil byproducts. However, it's important to note that cannabis waste also includes post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items. These streams of waste come from all industry stakeholders: cultivators, manufacturers, retailers, distributors and testing labs. Handling the volume of waste produced by these stakeholders creates an ancillary industry that must be regulated.

The regulations need to be updated to reflect who is qualified to properly manage cannabis waste. The vast amounts of cannabis waste produced by the industry pose a serious risk to public health, specifically children and the disenfranchised, if not handled by properly licensed cannabis waste haulers as opposed to general waste management service providers. Third party cannabis waste management companies must obtain the proper licenses to transport and render cannabis waste. Frequently, cannabis byproduct and waste are indistinguishable from safe-to-consume materials and/or products. To mitigate these risks, limiting the exposure of the public to cannabis waste vis-a-vis safe and sustainable disposal of cannabis waste that has been tracked and traced and handled by licensed cannabis waste haulers is imperative. It will ensure that all ecosystems—the environment, the public and industry stakeholders can successfully co-exist.

Thank you.

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#9

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 3:20:48 PM  
**Last Modified:** Tuesday, February 06, 2018 3:48:48 PM  
**Time Spent:** 00:28:00  
**IP Address:** 73.90.210.247

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Page 1

**Q1** First Name (Optional)

Ed

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**Q2** Last Name (Optional)

Howard

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**Q3** Organization (Optional)

UFCW

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**Q4** Title (Optional)

Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

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**Q6 Feedback for Subcommittee**

Thank you, in advance, and on behalf of the United Food and Commercial Workers Union (UFCW), for the opportunity to comment on the important work of this subcommittee. Social justice is a priority of our diverse membership. When it comes to the unprecedented challenge of regulating a vast and multi-faceted business that both (i) already existed, albeit unlawfully, (ii) has, unlike other new industries, to some degree emerged all at once, and (iii) is one that, when unlawful, was subject to prosecutions that caused deep and disproportionate pain and suffering in already historically disadvantaged communities, ensuring that the economic benefits offered by the legalization this industry are broadly shared, enjoyed by those individuals and communities that bore the brunt of its illegality, must be among the highest priorities of the Bureau and the Departments. It would be tragic if this once-in-a-lifetime opportunity to provide for a shared prosperity were lost and the profits generated by this new industry monopolized by those who both already have money and who were unaffected by the War on Drugs. To this end, equity must be front and center of every cannabis regulatory discussion and the question "what works" be the guiding North Star. To that end, we encourage the subcommittee to do four things: First, inventory what local equity efforts have been enacted. Second, determine whether they have measurably worked on the ground to promote broad-based ownership and profits flowing to historically disadvantaged groups. Third, research what comparable efforts have been made in other industries and evaluate whether they or parts of them have worked. Fourth, ensure that subcommittee and Advisory Committee members personally meet those in the communities where they and the activists that daily advocate for them live and work. In sum, we at UFCW stress how vital it is that we get this right, how tragic and unjust it will be to have the benefits of cannabis legalization remain apart from those who suffered when it was unlawful, and we remain eager to offer any aid that may be needed to help achieve this important goal.

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#10

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 7:36:54 PM  
**Last Modified:** Tuesday, February 06, 2018 7:52:19 PM  
**Time Spent:** 00:15:25  
**IP Address:** 76.175.15.230

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Page 1

**Q1** First Name (Optional)

Adam

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**Q2** Last Name (Optional)

Vine

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**Q3** Organization (Optional)

Cage-Free Cannabis

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**Q4** Title (Optional)

Cofounder

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

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**Equity Subcommittee**

**Q6 Feedback for Subcommittee**

Yours is the most important subcommittee: All of the work of the other subcommittees must be looked at through your lens.

Equity is not simply about licenses, though licenses are incredibly important. Licenses should indeed be given on a prioritized basis to people who have been impacted by the War on Drugs. That should include incarcerated people and their immediate families. Equity applicants should be given capital, banking, technical, legal, and real estate assistance. If California starts a bank, which it should, that bank's policies will need to be equitable. Incentivized hiring in the industry should also promote equity and repair of the harms of prohibition.

Beyond that, enforcement must be made equitable, access to medical marijuana must be made equitable, including incarcerated Californians, and the tax revenue allocation must promote equity and repair by funding re-entry assistance, low-cost medical marijuana, free/low-cost cannabis incubators and job training facilities, science-based educational workshops, free health screenings, scholarship funds, and other services that redress the negative effects of the War on Drugs.

As this industry continues to mature, equity will need to be studied, measured, analyzed, and improved. The importance - and vigilance - of this committee will remain central to the success of the entire cannabis program in California. Thank you for your work!

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#11

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 8:21:51 PM  
**Last Modified:** Tuesday, February 06, 2018 8:23:16 PM  
**Time Spent:** 00:01:24  
**IP Address:** 162.201.66.29

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Page 1

**Q1** First Name (Optional)

Respondent skipped this question

**Q2** Last Name (Optional)

Respondent skipped this question

**Q3** Organization (Optional)

Mendocino Generations

**Q4** Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee****Q6** Feedback for Subcommittee

February 6th, 2018

Dear Subcommittee Members,

We write to you today, as a group of small farms located throughout Mendocino County, to express our concerns with the current cannabis emergency regulations and are providing input on changes we would like to see made in the new regulations. We are grateful for the opportunity as stakeholders and interested parties to engage in this process. We hope that our suggestions will be considered when drafting the new regulations so that the cannabis-licensing program can operate with efficiency and success.

The largest license type allowed in Mendocino County is 10,000 sq ft of plant canopy. This equates to less than a quarter acre and considered a "hobby garden" by agricultural standards.

State regulations must take the vast disparity in permitted size cultivations throughout the state into consideration as permanent regulations are formulated. Committees must understand the historical significance and economic dependence of counties in the north coast region on cannabis cultivation. Small cannabis farmers need state protection to continue into the regulated and legal era to allow for a viable transition and avoid epidemic bankruptcies, defaults, plummeting property tax revenues and destruction of a unique cultural fabric that can be the regions opportunity rather than its demise.

## Cannabis Advisory Committee: Subcommittee Input Survey

Various compliance issues imposed specifically on the cannabis industry, and no other agricultural industry in California, by CDFA, CWQCB, Cal Fire, CDFW, and a slew of local jurisdictions are simply not viable for small farmers if scale, rural access, cooperative efficiencies and considerations for sustainable methods are not protected by the BCC.

Even though some small farmers may diversify into processing and or low impact manufacturing as regulations allow, our primary concern at this writing is for the small farmer, terrified that their homes, livelihood and decades of investments in the development of methods and genetics will arbitrarily be taken from them by the BCC if the ACA does not act now on their behalf.

Small cannabis cultivators must be afforded the same considerations and protections as other small agricultural endeavors like small vineyards, artisan breweries and related boutique style retailing of their products. As stated in SB94 and its incorporation into Business and Professional Code 26013(c), upon which all cultivators in the state relied under MAUCRSA, "mandate only commercially feasible procedures, technology or other requirements, and shall not unreasonably restrain or inhibit the development of alternative procedures or technology to achieve the same substantive requirements, nor shall such regulations make compliance so onerous that the operation under a cannabis license is not worthy of being carried out in practice by a reasonably prudent business person".

### REGARDING EQUITY:

We understand that this committee is more likely concerned with amnesty and conviction issues other than inequities. There is no other subcommittee category title, which might also consider equitable treatment of licensees in other ways as well.

For example, current tax structures need revisions.

1. It is far more equitable for state taxes on flower and leaf products to be tiered. Why is a per pound tax the same for a 10,000sq ft farmer in Mendocino County as it is for mass producer's multi-acre facilities in Fresno County? If small farmers, cultivating sustainable and ecologically superior farming in Mendocino County with lower yields are not taxed at a lower rate, we are in a severe disadvantage proportionally.
2. Tax is more equitably levied on number of plants or square footage of cultivation area.
3. Taxes should not be based on a fixed dollar amount but rather a percentage rate. By implementing a percentage tax, this allows for a more fair approach. If cannabis flowers have a market value of X in year 2018, it may change greatly the following year.
4. Tax deductions should be allowed as in any other business.
5. CWQCB, CDFA, CDFW, Cal Fire and all other reviewing state agencies must apply regulations equitably to all types of agriculture. AT THIS POINT, CANNABIS IS DISCRIMINATED AGAINST BY EACH AGENCY WHILE VINEYARDS, ORCHARDS, HAY, RICE AND MANY OTHER CROPS CONSUME MUCH MORE WATER AND RESOURCES THAN CANNABIS.

Thank you for your consideration and support,

Audrey's Farm  
Big Dirty Farms  
Briza Botanicals  
Brother Bee Farms  
Coastal Ridge Botanicals  
Emerald Naga Farms  
Empire Gardens  
Flatbed Ridge Farms  
Fire Flower Farm  
Full Sun Farms  
- - -



## Cannabis Advisory Committee: Subcommittee Input Survey

Giving Tree Farms  
Granny Jacks  
Gypsy Wagon Farms  
Herbanology Farms  
Higher On The Hog Farms  
Hummingbird Farms  
Laughing Farms  
Le Foret  
Magnolia & Fig Cultivars  
Mendocino Grasslands  
Mendocino Organic Medicine  
Moongazer Farms  
Oak Knoll Farms  
One Feather Ranch  
Potter Valley Farms  
Reach High Farm  
River Txai Farms  
Sensi Farms  
Sun N Moon Ranch  
Sunbright Gardens  
Sweet Sisters Family Farm  
UV Organics

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# #12

COMPLETE

**Collector:** Web Link 1 (Web Link)  
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**Last Modified:** Tuesday, February 06, 2018 8:32:09 PM  
**Time Spent:** 00:01:34  
**IP Address:** 64.194.161.33

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Page 1

**Q1** First Name (Optional)

Holly

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**Q2** Last Name (Optional)

Carter

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**Q3** Organization (Optional)

Redwood Roots

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**Q4** Title (Optional)

CCO

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

We ask for Re-education funds to farming communities to Infuse community colleges and vocational rehabilitation courses.

Funding of ag education courses via Ag Extension offices, especially to do with farm management, labor issues, and compliance issues.

Definitions of equity to look at disadvantaged communities, including rural communities as impacted by the war on drugs.

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#13

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 8:41:48 PM  
**Last Modified:** Tuesday, February 06, 2018 8:42:02 PM  
**Time Spent:** 00:00:13  
**IP Address:** 162.201.66.29

Page 1

**Q1 First Name (Optional)** Respondent skipped this question

**Q2 Last Name (Optional)** Respondent skipped this question

**Q3 Organization (Optional)** Respondent skipped this question

**Q4 Title (Optional)** Respondent skipped this question

**Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.** **Equity Subcommittee**

**Q6 Feedback for Subcommittee**

State Regulation Amendment Requests:

- 1.Determine canopy of plants based on each plant and do not include pathways in canopy determination
- 2.Lower the cultivation tax and base it on a percentage rather than fixed dollar amounts
- 3.Order more track and trace tags since there seems to be only a limited number
- 4.Remove the 4-acre cap on Co-Ops
- 5.Reinstate the acreage cap on licenses
- 6.Remove the requirement that all activities of a micro business license occur on the same premises. Many cultivators in rural counties will not be able to comply due to zoning restrictions. Consider opening up packaging, processing and/or manufacturing to other zoning districts as there are any extremely limited amount currently available. Perhaps allow outside dense residential areas?
- 7.Remove Track and Trace requirements of weighing wet weight at harvest. This requirement does not make sense since the cannabis will change greatly in weight once it is fully dried. Weather (hot and dry vs rainy) will also greatly affect wet weight so there will be no benefit to a wet weight as it's completely arbitrary. Each plant and strain will vary in terms of how much moisture is lost in the curing

## Cannabis Advisory Committee: Subcommittee Input Survey

process. Therefore for cultivators selling dry product, require a dry weight amount to be entered and not wet weight of the entire plant.

8. Remove the 25 and 50 plant count for specialty cottage outdoor and specialty outdoor license types and instead use 2500 sq ft and 5,000sq ft. The corresponding permits under mixed light allow for sq ft canopy size, outdoors should match.

9. Monitor the testing prices being set by each lab. These costs are WAY too high for any small specialty cottage cultivator to be able to afford. Especially if cultivating 25 plants, at \$600-\$1000 per batch test, cultivators will struggle greatly to afford these prices for testing.

The regulatory expansion related to testing is going to either push prices higher which will make it not accessible for lower income patients and consumers or force small farmers to cultivate the same strain in a batch to try and save the margin.

For small batch cultivators, if you produce 3 units in a batch these testing costs of \$600-1000 per batch (or \$200-333 per unit) plus the flat cultivation tax rate of \$148 per unit is now nearly reducing the margin for the cultivator to a net negative.

10. Set eco-friendly standards for packaging to lessen the industry's impact on consumer waste in California.

11. Please remove the Camera regulations for small cultivators especially in rural counties such as Mendocino County. Small farms off grid with limited access to internet if any will have a serious hardship in complying with this standard. Perhaps a game camera could qualify for this regulation. This should also be considered for micro-business farms that are located in rural areas.

12. Allow people/companies with multiple permits to process all cannabis at one location. This will reduce having to setup and maintain multiple processing locations and equipment and lessen environmental impacts.

13. Remove the 25 plant count for specialty cottage license and instead use 2500 sq feet or at the very least allow the option of either 25 plants OR 2500 sq ft

14. Allow cultivators to process their own cannabis onsite under home-occupation as long as it meets the requirements of local county and city building codes etc.

16. For micro-business, allow direct sales at farmer's markets or events or other non-store front retail to count as a retail use, and allow distributor-transport only to count as distributor use... this will allow more cultivators to apply for a micro-business if they live in rural areas where zoning will not allow for retail locations or full distribution.

17. Support direct local sales through expanded venue allowances for cannabis events

18. Allow the cultivation license to be transferable in the event of a land sale. Allow an optional "inactive" status for cultivation licenses that would keep the license valid even if not in use. The investment required to comply and obtain a cultivation license is a direct investment to property making it part of the asset. The ability for a small farmer to succeed in this new market place is unknown at best and if they should choose to not participate their investment needs to be protected.

19. Allow the storage of cannabis to include cargo containers with a length of 40 feet.

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#14

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 8:37:46 PM  
**Last Modified:** Tuesday, February 06, 2018 8:48:33 PM  
**Time Spent:** 00:10:46  
**IP Address:** 107.200.44.228

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Page 1

**Q1** First Name (Optional)

Hannah

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**Q2** Last Name (Optional)

Nelson

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**Q3** Organization (Optional)

Hannah L. Nelson Attorney At Law

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**Q4** Title (Optional)

Mendocino County Working Group Member/Attorney/Cannabis Policy Advisor

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

### Q6 Feedback for Subcommittee

Equity subcommittee:

I am an attorney who has specialized in cannabis and cannabis related policy for more than 25 years. As a long time criminal defense, civil rights, and forfeiture attorney, I saw first-hand the impact of the war on drugs in rural Northern California. In addition to my prior work as a litigator, I have long been involved with cannabis related public policy. In 1999, after the California Supreme Court upheld the case I litigated pro bono for nearly three years requiring the first-ever court-ordered return of seized medical cannabis, the then District Attorney, then Sheriff, and I proposed a permitting scheme to the then Board of Supervisors. We were ahead of our time and the matter was not pursued. However, in 2009, I was recruited by Sheriff Tom Allman to help craft the original permitting program in Mendocino County. I have been intimately involved in helping draft cannabis policies and permitting programs ever since. I currently serve on five Mendocino County Working Groups and maintain a practice that assists applicants through the regulatory process at the local and state levels across all agencies. I am excited to see the emerging regulated industry. Given my interaction with local and state agencies as well as applicants, I have discovered numerous issues that are ripe for discussion as the CAC advises the regulatory agencies on non-emergency regulation drafting.

The negative impact from the War on Drugs is not just an urban issue. Rural cultivators from 1980s onward were subjected to military style raids, constant low-flying over-flights, and some out-of-control (over zealous) law enforcement officers who would intentionally trash homes, hold families at gunpoint and spray paint obscenities on walls. There is substantial evidence from the Camp lawsuits, Operation Greensweep lawsuit, and other litigation I helped to conduct first with attorney Ron Sinoway then at my then law firm, Pacific Justice Center. Some of the litigation was on behalf of the Civil Liberties Monitoring Project, who may still have files. My office was burned down, so I do not have immediate access to those materials, but could probably track them down.

Small farmers today, especially those that directly experience the effects of being under siege in that manner, deserve equity programs just as much as inner city survivors. In those days, my clients who were busted, were facing 20 years in prison, not just fines. The threats and intimidation tactics used to force people to plead out or turn against their neighbors was intense. The convictions that people suffered had lasting impact on their ability to obtain employment, participate in civil and political processes, straddled them with huge fines and costs that wiped them out. The PTSD of many who were raided in such extreme and violent ways was real and lasting.

When discussing equity programs, please do not forget the rural farmers that were subjected to paramilitary style raids and suffered enormous consequences for the forfeiture-fueled zealous enforcement.

Thank you for your consideration.

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#15

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 9:01:30 PM  
**Last Modified:** Tuesday, February 06, 2018 9:01:58 PM  
**Time Spent:** 00:00:27  
**IP Address:** 162.201.66.29

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Page 1

**Q1** First Name (Optional)

Respondent skipped this question

**Q2** Last Name (Optional)

Respondent skipped this question

**Q3** Organization (Optional)

Respondent skipped this question

**Q4** Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee****Q6** Feedback for Subcommittee

Equity Sub-Committee

1. Lower the cultivation tax and base it on a percentage rather than fixed dollar amounts
  2. Order more track and trace tags since there seems to be only a limited number
  3. Allow the cultivation license to be transferable in the event of a land sale. Allow an optional "inactive" status for cultivation licenses that would keep the license valid even if not in use. The investment required to comply and obtain a cultivation license is a direct investment to property making it part of the asset. The ability for a small farmer to succeed in this new market place is unknown at best and if they should choose to not participate their investment needs to be protected.
  4. Support direct local sales through expanded venue allowances for cannabis events
-

#16

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 9:35:52 PM  
**Last Modified:** Tuesday, February 06, 2018 9:36:41 PM  
**Time Spent:** 00:00:48  
**IP Address:** 184.63.249.150

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Page 1

**Q1** First Name (Optional)

Charles

**Q2** Last Name (Optional)

Sargenti

**Q3** Organization (Optional)

Respondent skipped this question

**Q4** Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Equity Subcommittee

**Q6** Feedback for Subcommittee

1. Lower the cultivation tax and base it on a percentage rather than fixed dollar amounts
  2. Order more track and trace tags since there seems to be only a limited number
  3. Allow the cultivation license to be transferable in the event of a land sale. Allow an optional "inactive" status for cultivation licenses that would keep the license valid even if not in use. The investment required to comply and obtain a cultivation license is a direct investment to property making it part of the asset. The ability for a small farmer to succeed in this new market place is unknown at best and if they should choose to not participate their investment needs to be protected.
  4. Support direct local sales through expanded venue allowances for cannabis events
-



#17

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 10:43:31 PM  
**Last Modified:** Tuesday, February 06, 2018 10:44:40 PM  
**Time Spent:** 00:01:08  
**IP Address:** 73.93.81.251

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Page 1

**Q1** First Name (Optional)

Valerie Leveroni

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**Q2** Last Name (Optional)

Corral

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**Q3** Organization (Optional)

WAMM - Wo/Men's Alliance for Medical Marijuana

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**Q4** Title (Optional)

Director, Co-Founder

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

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**Equity Subcommittee**

**Q6 Feedback for Subcommittee**

Since our inception in 1993 WAMM, the Wo/Men's Alliance for Medical Marijuana in Santa Cruz California, has openly assisted thousands of patients, providing in-home care, support services, end of life assistance, and cannabis therapies on a donation basis. WAMM is the longest running medical marijuana organization in the US and functions solely to reduce human suffering through the healing process including up to the moment of death.

For 25 years we have worked closely with the City and County of Santa Cruz to provide our unique brand of service. We have been at the vanguard of the medical marijuana movement, achieving national and international recognition through our model of Compassionate Access. WAMM provides unparalleled service that has inspired a generation and served thousands of seriously ill people. Continuing to build on the foresight that sustained a generation and led to the recognition of civil liberty for patients and eventually legalization of cannabis, brings with it the opportunity for our state to capitalize on increased tax revenues.

**Compassionate Access**

As we observe a burgeoning cannabis industry flourish, each day increasing numbers of patients are less able to access cannabis to meet their needs. 643,000 American are driven to bankruptcy due to medical bills each year, with Californians making up over 17% of those claims. Today our efforts to maintain philanthropy and public service are even greater than ever before, because seriously ill and dying people are not being served by those profiting from the cannabis trade. While governments cannot "legislate compassion," surely efforts to sustain the momentum that has distinguished WAMM and the cannabis compassion movement fuels the potential for legislative action that promotes replicable compassion models.

I don't know the answer; perhaps a type of tax credit, a small business benefit, an enticement program, reallocation of tax funds, or another avenue that equates the relief of human suffering with that of financial gain. Whatever legal framework that you choose to complement our renowned compassion model, will carry your signature. This is a message that we can carry to the world, reminding that when such a responsibility is shared the impact is exponential.

Even if a lack of personal experience lay at the core of our state's legislative failure to include a mechanism for compassionate access, each of us - citizens, our communities, the state as a whole, and every corporate structure - have a social responsibility. To ignore this has profound human consequences.

This is your job. Please allow us to help you, to help relieve suffering.

Sincere regards,

Valerie Corral

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#18

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 10:50:59 PM  
**Last Modified:** Tuesday, February 06, 2018 10:51:49 PM  
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Page 1

**Q1** First Name (Optional) Respondent skipped this question

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**Q2** Last Name (Optional) Respondent skipped this question

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**Q3** Organization (Optional) Respondent skipped this question

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**Q4** Title (Optional) Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

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**Q6** Feedback for Subcommittee

Lower the cultivation tax and base it on a percentage rather than fixed dollar amounts. This is unconstitutional.

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#19

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, February 06, 2018 10:51:53 PM  
**Last Modified:** Tuesday, February 06, 2018 10:52:24 PM  
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Page 1

**Q1** First Name (Optional) Respondent skipped this question

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**Q2** Last Name (Optional) Respondent skipped this question

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**Q3** Organization (Optional) Respondent skipped this question

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**Q4** Title (Optional) Respondent skipped this question

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Equity Subcommittee**

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**Q6** Feedback for Subcommittee

Allow the cultivation license to be transferable in the event of a land sale. Allow an optional "inactive" status for cultivation licenses that would keep the license valid even if not in use. The investment required to comply and obtain a cultivation license is a direct investment to property making it part of the asset. The ability for a small farmer to succeed in this new market place is unknown at best and if they should choose to not participate their investment needs to be protected.

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#20

COMPLETE

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**Time Spent:** 00:11:34  
**IP Address:** 73.162.42.224

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Page 1

**Q1** First Name (Optional)

Ryan

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**Q2** Last Name (Optional)

Miller

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**Q3** Organization (Optional)

Operation EVAC

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**Q4** Title (Optional)

Co-founder

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

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**Equity Subcommittee**

## Cannabis Advisory Committee: Subcommittee Input Survey

### Q6 Feedback for Subcommittee

Thank you for soliciting insight from the community toward shaping California cannabis policy. The notion of reconciling the racist war on drugs with equity policy is particularly encouraging and your leadership is important and appreciated.

Operation EVAC facilitates (16) peer-led social support groups for military veterans at (6) cannabis dispensaries in (5) Northern California cities mostly since Memorial Day, 2016.

Our mission is to promote the growth and healing of military veterans through mutual assistance, personal development, and community service.

We prevent suicide and opiate overdose through curating community and practicing mindfulness, with the aid of compassionate cannabis and education.

Our ask is that you consider expanding equity to include military veterans or create a parallel system essentially identical to equity for military veterans.

Horticultural therapy is a legitimate healing modality that enables warriors whom may have violently extinguished life to find restoration through gently nurturing life. The Santa Cruz Veterans Alliance leads the way in this approach.

What I hope to impart upon you is that the school to prison pipeline and the military to prison pipeline intersect in the same low-income communities.

Those of us whom avoid incarceration are funneled toward violent servitude, clambering toward upward social mobility.

Thank you for considering inclusion toward military veterans and I hope that you agree that we've earned supportive access to the marketplace.

This initiative would ameliorate the licensure bottle-neck that we're experiencing with the shortage of equity applicants.

Thank you for your consideration.

In gratitude,  
Ryan Miller

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#21

**COMPLETE**

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**Last Modified:** Tuesday, February 06, 2018 11:07:54 PM  
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**Q1** First Name (Optional)

Respondent skipped this question

**Q2** Last Name (Optional)

Respondent skipped this question

**Q3** Organization (Optional)

Respondent skipped this question

**Q4** Title (Optional)

Respondent skipped this question

**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee****Q6** Feedback for Subcommittee

This is the most important committee and all members of other subcommittees should participate actively.

Equity is a priority written into Prop 64 via the community funds for those most impacted by the war on drugs. Failure to support those local efforts via transparency and resources at the state level will be a mark on the state of California. I hope we put thought into implementing programs and taking feedback from the stakeholders.

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#22

COMPLETE

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**Time Spent:** 00:01:55  
**IP Address:** 71.146.0.203

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Page 1

**Q1** First Name (Optional)

Genine

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**Q2** Last Name (Optional)

Coleman

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**Q3** Organization (Optional)

Mendocino Appellations Project

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**Q4** Title (Optional)

Executive Director

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

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**Equity Subcommittee**



**Q6 Feedback for Subcommittee**

Over the past half century, California's legacy cannabis producing regions developed complex local economies reliant upon cannabis farming. Established over generations and decades, these agrarian economies have become endemic to these regions.

These legacy producing regions have been essential in bringing California to this historic crossroads of cannabis regulation. Within these regions, small farmers have produced cannabis under state and local legal frameworks, while being simultaneously subject to a militarized drug war. This has created both enduring damage and resilience within these communities.

For many legacy producers in these regions, the transition into regulation is becoming insurmountable. Many of these regions are in danger of turning upside down very quickly, subject to widespread illicit activity and significant economic collapse.

Recommend the development of state funded education and assistance programs supporting legacy farmer communities that are working to transition into regulation and in significant need. Programmatic recommendations include; assistance grants, compliance training, business development services, agricultural education.

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#23

COMPLETE

**Collector:** Web Link 1 (Web Link)  
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**Time Spent:** 00:02:08  
**IP Address:** 23.119.139.180

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Page 1

**Q1** First Name (Optional)

Ted E

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**Q2** Last Name (Optional)

Norton

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**Q3** Organization (Optional)

10S corp

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**Q4** Title (Optional)

owner

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**Q5** Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Equity Subcommittee**

**Q6** Feedback for Subcommittee

hugh task - I am willing to help, how can I?

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